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RECEIVED
JAN 30 2001
Federal Communications Commission
Office of Secretary

January 26, 2001

94-102

**Via Hand Delivery**
Thomas J. Sugrue, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
Washington, D.C. 20554

Re: E911 Phase II Carrier Implementation Report

Dear Mr. Sugrue:

On behalf of Virginia Cellular, Inc., ("Virginia Cellular"), TRS No. 812367, this letter is in response to your letter dated December 6, 2000 which indicates that according to the Commission's records Virginia Cellular did not file the required E911 Phase II Carrier Implementation Report by November 9, 2000.

However, our records show that Virginia Cellular did file on November 7, 2000. Attached to this letter is a dated stamped receipt copy of the filing made on behalf Virginia Cellular on November 7, 2000.

In addition, please note that Virginia Cellular is only now responding to the December 6, 2000 letter because the letter was incorrectly addressed to an address in Redmond, Washington, rather than Virginia Cellular's Staunton, Virginia address.

Please correct the Commission's records to reflect the timely filing by Virginia Cellular. If you have any questions regarding this matter do not hesitate to contact me.

Very truly yours,

B. Lynn F. Ratnavale

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c: WendyAustrie

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November 7, 2000

RECEIVED

NOV 7 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: **Virginia Cellular, Inc. d/b/a Cellular One**
E-911 Phase 2 Implementation Plan

Dear Ms. Salas:

On behalf of Virginia Cellular, Inc. d/b/a Cellular One ("VCI") and pursuant to Section 20.18(i) of the Commission's Rules, enclosed is a narrative statement regarding VCI's E-911 Phase 2 implementation plans.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

B. Lynn F. Ratnavale

B. Lynn F. Ratnavale

c: International Transcription Service (w/ enc. on diskette)
Jay Whaley (w/ enclosure)

# Virginia Cellular, Inc. d/b/a Cellular One E911 Phase II Implementation Plans

## Carrier Identifying Information

Virginia Cellular, Inc. T/A Cellular One
TRS Number – 812367

## Contact Information

**Thomas R. Legg**
**Operations Manager**
**Virginia Cellular, Inc.**
**P.O. Box 1002**
**Staunton, VA 24402**
**Phone number – (540) 886-1065**
**Fax number – (540) 886-1068**
**Email –**
**tlegg@c1v.net**

**Type of Technology: Virginia Cellular, Inc. ("VCI") has employed the services of GTE-TSI to facilitate its implementation of E911. The company currently anticipates deploying a network based product, however, a final commitment has not been made to deploy this technology.**

**If use of a network-based technology is confirmed, VCI will likely utilize a combination of TDOA (TimeDifference of Arrival) and AOA (Angle of Arrival) technology position determining equipment. TDOA uses multiple receivers, located at cell sites, with highly accurate timing sources. It requires a minimum of three receivers to locate a caller. The mobile unit's signal is received at the cell sites and time stamped. The difference in the time received is used to calculate intersecting hyperbolic lines. The intersection of these lines is an estimation of the caller's location.**

**AOA utilizes an array of specialized antennas located at cell sites. The array determines the angle at which the mobile unit's signal arrives at each element of an array. The intersection of the angle at which the signal arrives at multiple cell sites is used to estimate the location of the caller. VCI will likely use the same technology throughout its service territory.**

**Testing and Verification: VCI intends to hire GTE-TSI and other outside vendors to facilitate testing and verification. VCI is unaware as to whether or not GTE-TSI has performed any testing to date. VCI itself has performed no testing to date. VCI will adopt testing and verification methods and procedures based on sound engineering and statistical practices. This testing and verification will likely be incorporated into routine testing of the wireless network by company technicians.**

**Implementation Details and Schedule: VCI installed a new switch in September 2000 which was the first hardware upgrade required for E911 implementation. VCI's strategy will be to purchase the required equipment (hardware and software)**

and services on the competitive market and deploy the same in accordance with the Commission's rules. VCI will notify the FCC of a specific schedule for implementation once its vendor has confirmed a delivery date. VCI recognizes that the Commission's rules require the deployment of a Phase II system, even if none exists which fully meet the Commission's accuracy requirements.

PSAP Interface: VCI installed a new switch in September 2000 which was the first hardware upgrade required to interface with the various PSAP's. The Company has contracted with GTE-TSI to provide network connectivity and data base translations to communicate with the local PSAP's. The company anticipates additional hardware and software upgrades to be required, however, the specifications and schedule has not been finalized.

Existing Handsets & Location of Non-Compatible Handsets: VCI is currently anticipating deploying a network based solution, therefore, no handset modifications are expected.

Other information: VCI has not received any requests from PSAP's for Phase II compliance as of the date of this report. As any additional information becomes known to VCI, an amendment to this report will be submitted to the FCC.